

PL Sum. J.

Ex. 017



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Transcript of **Bharat Patel**

Wednesday, May 25, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 115849

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 W.K., E.H., M.M., R.P.,
5 M.B., D.P., A.F., C.A.,
6 K.K., K.P., and T.H.,
7 Plaintiffs,

8 vs. CASE NO. 1:20-cv-5263-MHC

9 RED ROOF INNS, INC., FMW
10 RRI NC, LLC, RED ROOF
11 FRANCHISING, LLC, RRI WEST
12 MANAGEMENT, LLC, VARAHI HOTEL, LLC,
13 WESTMONT HOSPITALITY GROUP,
14 INC., and RRI, III, LLC,
15 Defendants.

16 JANE DOE 1-4,
17 Plaintiff,

18 Vs. CASE NO: 1:21-cv-04278-WMR

19 RED ROOF INNS, INC., et al,
20 Defendant.

21 J.A.,
22 Plaintiff,

23 Vs. CASE NO: 1:21-cv-03655-TWT

24 RED ROOF INSS, INC.,
25 RED ROOF FRANCHISING, LLC,
26 And VARAHI HOTEL, LLC,
27 Defendants.

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29 Videotaped deposition of BHARAT PATEL,

30 Taken by Denise Hoying,

31 Before Amanda F. Rogers,
32 Certified Court Reporter,

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1 ALSO PRESENT:

2 Carlos Rodfri, Videographer
3 Salina Bandali, Interpreter

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1 it says, "Skin still crawling"?

2 A Yes.

3 Q Can you read the first sentence
4 underneath, "Skin still crawling," please?

5 A (Witness in English) "This place is
6 disgusting. Unfortunately, I didn't realize how
7 bad it was until the morning. I was checking
8 out."

9 Q Okay. And if you could go down to the
10 second to last line of the review. It talks
11 about a "no refund after 15 minutes sign at the
12 front desk." Do you see that?

13 A (Witness in English) "No refunds
14 after 15 minute sign on the front desk."

15 Q Did you put that sign at the front
16 desk?

17 A Yes.

18 Q Why did you put that sign at the front
19 desk?

20 A Because, we have this policy when the
21 guests check in the rooms that we would ask them,
22 call them and the front desk would call and ask
23 them if they were situated if they are satisfied
24 because if they are not at that point, be then,
25 you know, we would cancel the reservation and

1 Q [REDACTED]

2 [REDACTED]

3 A Yes.

4 Q [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] Did I read that correctly?

9 THE INTERPRETER: Is this something
10 that you want me to translate, because it is a
11 legal document?

12 BY MR. VARGHESE:

13 Q I'm just asking if I read these words
14 correctly.

15 A I think that we have to pay a royalty
16 fee to the franchisor because my corporation
17 would pay a franchise fee to the franchise.

18 Q So let me ask that question, Varahi
19 Hotel pays a monthly franchise fee to Red Roof
20 Franchising, correct?

21 A Yes.

22 Q And Varahi Hotel has paid that fee
23 every month from December 2012 to the present,
24 correct?

25 A Yes.

1 Q And that monthly royalty fee is a
2 percent of your gross room revenues, correct?

3 MR. ALLUSHI: Objection.

4 THE WITNESS: Yes. It is based on
5 that fact.

6 BY MR. VARGHESE:

7 Q And the fee you receive from renting
8 each and every hotel room is part of the gross
9 room revenues, correct?

10 A Well, they would do it -- once it is
11 charged, then they would tell us whatever the fee
12 is. Then whatever we have to send them.

13 Q Do you understand that the fee you
14 paid to Red Roof Franchising is based on the
15 total amount of room revenues that the location
16 generates?

17 A Yes.

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

C E R T I F I C A T E

GEORGIA

FULTON COUNTY

I hereby certify that the above and foregoing pages 1 through 234 are a true, complete, correct, and exact transcript of my shorthand notes taken in the above-referenced matter;

That same constitutes a true, complete, correct, and exact record of the above-referenced matter;

That same was transcribed through computer-assisted transcription;

That I am not of kin or counsel to any of the attorneys or parties, nor am I in the regular employ of any of the attorneys or parties;

This 9th day of June, 2022.



Amanda F. Rogers, CCR B-2274

Certified Court Reporter